

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SEAMRÓG FUND ICAV, acting solely in  
respect of its sub-fund, SEAMRÓG  
SOVEREIGN RECOVERY SUB-FUND, and  
EDWARD COWEN

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF  
VENEZUELA,

Defendant.

Case No. 1:23-cv-05896-AT

**JOINT STATUS REPORT**

1. This case involves breach-of-contract claims that Plaintiffs Seamróg Sovereign Recovery Sub-Fund and Edward Cowen, beneficial owners of eight series of Venezuelan bonds, have brought against the Bolivarian Republic of Venezuela.

2. Plaintiffs filed the operative amended complaint on May 14, 2024 (ECF 14), and service was effected through diplomatic means on September 4, 2024.

3. On October 31, 2024, this Court granted Venezuela's motion for a four-week extension of time to respond to the amended complaint, through December 2, 2024. ECF 25.

4. On November 22, pursuant to Rule III.B of this Court's Individual Practices, Venezuela sent Plaintiffs a letter informing Plaintiffs that Venezuela intends to move to dismiss the amended complaint based on three purported pleading deficiencies.

5. On November 25, the parties conferred to discuss Venezuela's pre-motion letter and possible amendments to the complaint.

6. Plaintiffs intend to file a motion to amend their complaint by December 6, 2024.

7. In the interest of efficiency, in light of Plaintiffs' intention to request leave to amend their complaint, the parties have agreed that Plaintiffs will not respond to Venezuela's pre-motion letter and Venezuela will not respond to the operative amended complaint on December 2.

Date: December 2, 2024

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Respectfully submitted,

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